

**The United States District Court  
844 King Street  
Wilmington, Delaware 19801**

**Jourdean Lorah - Plaintiff  
114 Walls Ave.  
Wilmington, Delaware 19805**

**Case Number 1:06-CV-539 SLR**

**V**

**Department of Environmental and  
Natural Resources  
89 King's Highway  
Dover, DE. 19901**

**PMA Management Corporation  
P.O. Box 25249  
Lehigh Valley, Pennsylvania 18002-5249**

**Department of Justice  
Carvel Office State Building  
Robert Phillips  
820 N. French Street  
Wilmington, DE. 19801**

**Morris and Williams  
Jennifer Hurvitz  
P.O. Box 709  
824 Market Street Suite 902  
Wilmington, DE. 19899-0709**

FILED  
U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2007 MAR 13 PM 3:49

**MOTION TO FILE THE FOLLOWING BRIEF**

**On March 9, 2007, Plaintiff, Jourdean Lorah filed a brief referencing case number 1:06-CV-539. The brief needs to include The PMA Management Corporation on the front of the brief. Plaintiff, respectively prays that this motion is granted.**

*Jourdean Lorah*

**United States District Court  
844 King Street  
Wilmington, Delaware 19801**

**Jourdean Lorah - Plaintiff  
114 Walls Ave.  
Wilmington, Delaware 19805**

**Case Number 1:06-CV-539 SLR**

**V**

**Department of Environmental and Natural Resources - Defendant  
89 King's Highway  
Dover, Delaware 19901**

**PMA Management Corporation  
P.O. Box 25249  
LehighValley, Pennsylvania**

**Department of Justice  
Attention: Robert Phillips  
Carvel State Office Building  
820 N. French Street  
Wilmington, Delaware 19801**

**Motion Regarding Medical Records, Disability and Relief**

**Plaintiff, Jourdean S. Lorah has enclosed with this motion a brief which outlines all medical records pertaining to injury and disability. Plaintiff's has set forth the statement of facts which have proved discrimination and retaliation. The Department of Environmental and Natural Resources has misapprehended the law regarding the Plaintiff's name, gender and address. Plaintiff, Jourdean Lorah is a forty eight year old female not a an eighteen year old male. Plaintiff, has suffered from the emotional distress of a chemical whiff which is at the Plaintiff's job, and at Delaware Technical Community College in Stanton located in Newark, Delaware**

where she attends school. Plaintiff, Jourdean Lorah was also gassed outside of the Biology Lab at Delaware Technical Community College on September 27, 2006. Plaintiff, Jourdean Lorah has also provided the United States District Court with evidence that she has suffered from a physical injury that occurred on the job in PA. The Department of Environmental and Natural Resources is an agent, but not the employer. DNREC is responsible for environmental problems that were reported by the Plaintiff. Under Title VII, the plaintiff has been discriminated by way of age, gender and disability for many years. Plaintiff, Jourdean Lorah has been wrongfully terminated from her part time position at Tatnall School on (Dec. 7, 2006) without just cause. Those violations under Title VII are continuing and pending. Plaintiff, Jourdean Lorah is seeking relief from the Department of Environmental and Natural Resources or The United States District Court in Wilmington, DE. Tafoya V Adams (DC Colo) 612 F Supp 1097, 78 ALR Fed 477. All other agents, officials, supervisors and administrators that knew the Plaintiff was violated have been included in the statement of facts. Plaintiff, Jourdean respectively prays that The United States District Court will grant her the relief in the amount of \$300,000.00 that is presently needed for loss of promotions, no opportunity, damages, no retirement and injury. Plaintiff, Jourdean Lorah has also been denied the enjoyment/accommodation of taking an exercise class at The New Castle County Hockessin Community Center. Plaintiff, Jourdean Lorah was harassed incessantly as Jordan Lorah's identity (male). Plaintiff, Jourdean Lorah is not a prisoner and her rights to enjoy a service provided by New Castle County to the public has been misapprehended and discriminated by way of gender. Turnbill

V Fink Del. Supr., 668 a. 2D 1370 (1995) Plaintiff, Jourdean Lorah was told by a council member of New Castle County during mediation to take the money (all classes that were taken at New Castle County) and go to another exercise class. The amount of money that was paid to New Castle County for the exercise program was never returned nor was the Plaintiff accommodated. Plaintiff, Jourdean provided security for the state of Delaware through a company in Virginia. Plaintiff, Jourdean Lorah is not able to afford the representation of an attorney. Plaintiff's rights have been violated and statute of limitations concerning security (American International Security) is over. No one involved in the misapprehension of the law is allowed to deny the Plaintiff equal opportunity, enjoyment of programs that are offered to the public nor deny the Plaintiff, Jourdean her worth in The Martin Luther King Library. The history presently in The Martin Luther King Library is not about greed. It is simply about freedom, equal opportunity, rights and the right to be given your worth when you are worthy. Plaintiff, Jourdean Lorah respectively prays that The United States District Court will grant the relief.

**CERTIFICATE OF SERVICE**

On this day of MARCH 13, 2007, the following documents were  
either sent or delivered to the Defendant.

**Jourdean Lorah - Plaintiff**  
114 Walls Ave.  
Wilmington, Delaware 19805

A handwritten signature in cursive script that reads "Jourdean Lorah".

**Department of Natural Resources and Environmental Control - Defendant**  
89 King's Highway  
Dover, Delaware 19901

**PMA Management Corporation**  
P.O. Box 25249  
Lehigh Valley, Pennsylvania 18002-5249

**Department of Justice**  
**Attention: Robert Phillips**  
Carvel State Office Building  
820 N. French Street  
Wilmington, Delaware 19801

**Morris and Williams**  
**Jennifer Hurvitz**  
P.O. Box 709  
824 North Market Street Suite 902  
Wilmington, Delaware 19899-0709